

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**JOSEPH ABOUD MANUFACTURING
CORP.**, on behalf of itself and all others similarly
situated,

Plaintiff,

vs.

**WILLIAM PRYM GMBH & CO., KG; PRYM
CONSUMER USA, INC.; PRYM FASHION,
INC.; COATS PLC; COATS NORTH
AMERICA DE REPUBLICA DOMINICANA,
INC.; YKK CORPORATION; YKK
CORPORATION OF AMERICA, INC.; YKK
(U.S.A.) INC.; YKK SNAP FASTENERS
AMERICA, INC.; and SCOVILL
FASTENERS, INC.**

Defendants.

Civil Action No. 07-cv-10641(DC)

**MOTION TO ADMIT
COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States Courts for the
Southern and Eastern Districts of New York, I Linda P. Nussbaum, a member in good standing
of the Bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

Daniel C. Simons
Berger & Montague, P.C.
1622 Locust Street
Philadelphia, PA 19103
Phone: (215) 875-3000
Fax: (215) 875-4604

Daniel C. Simons is a member in good standing of the Bar of the Commonwealth of
Pennsylvania and the State of New Jersey.

There are no pending disciplinary proceedings against Daniel C. Simons in any State or
Federal court.

Dated: January 3, 2008
New York, New York

Respectfully Submitted,



Linda P. Nussbaum (LN-9336)
KAPLAN, FOX & KILSHEIMER, LLP
850 Third Avenue, 14th Floor
New York, NY 10022
Phone: (212) 687-1980
Fax: (212) 687-7714

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Defendants.

Civil Action No. 07-cv-10641(DC)

**AFFIDAVIT OF LINDA P.
NUSSBAUM IN SUPPORT OF
MOTION TO ADMIT
COUNSEL PRO HAC VICE**

State of New York)
)
 ss
County of New York)

Linda P. Nussbaum, being duly sworn, hereby deposes and says as follows:

1. I am a Partner at Kaplan, Fox & Kilsheimer, LLP, Counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of Plaintiff's motion to admit Daniel C. Simons as counsel pro hac vice to represent Plaintiff in this matter.
2. I am a member in good standing of the bar of the State of New York, and was admitted to Practice law on March 15, 1978. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Daniel C. Simons since 2003.
4. Mr. Simons is a member of the Firm of Berger & Montague, P.C. in Philadelphia, PA.
5. I have found Mr. Simons to be a skilled attorney and a person of integrity. He is experienced in Federal practice and is familiar with the Federal Rules of Procedure.

6. Accordingly, I am pleased to move the admission of Mr. Simons, pro hac vice.

7. I respectfully submit a proposed order granting the admission of Daniel C. Simons, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE, it is respectfully requested that the motion to admit Daniel C. Simons, pro hac vice, to represent Plaintiff in the above captioned matter, be granted.

Dated: January 3, 2008
New York, NY

Respectfully submitted,


Linda P. Nussbaum (LPN 9336)


1/4/08
TIREK J. GAYLE
Notary Public, State of New York
No. 01GA6066847
Qualified in Bronx County
Commission Expires Nov. 26, 2009



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Daniel C. Simons, Esq.

DATE OF ADMISSION

April 6, 2001

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: December 19, 2007



Patricia A. Johnson
Chief Clerk

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AMERICA, INC.; and SCOVILL
FASTENERS, INC.**

Defendants.

Civil Action No. 07-cv-10641(DC)

**ORDER FOR ADMISSION
PRO HAC VICE
ON WRITTEN MOTION**

Upon the motion of Linda P. Nussbaum for Joseph Abboud Manufacturing Corp. and said
sponsor attorney's affidavit in support,

IT IS HEREBY ORDERED THAT:

Daniel C. Simons
Berger & Montague, P.C.
1622 Locust Street
Philadelphia, PA 19103
Phone: (215) 875-4675
Fax: (215) 875-4604

Is admitted to practice pro hac vice as counsel for Joseph Abboud Manufacturing Corp. in the
above captioned case in the United States District Court for the Southern District of New York.
All attorneys appearing before this Court are subject to the Local Rules of this Court, including
the Rules governing discipline of attorneys. If this action is assigned to Electronic Case Filing
(ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov.
Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:

Judge Denny Chin

AFFIDAVIT OF SERVICE

The undersigned hereby certifies that on the 3rd day of January, 2008, true and correct copies of the annexed Motion to Admit Counsel Pro Hac Vice along with all supporting documents was served via First Class U.S. Mail on the following:

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Roseann Kelly